

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION
CASE NO. 3:22-CV-00049-NKM

BABY DOE, <i>et al.</i> ,)	
)	
Plaintiffs,)	MOTION OF COUNSEL
v.)	FOR B. TYLER BROOKS, ESQ.
JOSHUA MAST, <i>et al.</i> ,)	TO APPEAR PRO HAC VICE
)	ON BEHALF OF DEFENDANT
Defendants,)	
and)	
UNITED STATES SECRETARY OF)	
STATE ANTONY BLINKEN, <i>et al.</i> ,)	
Nominal Defendants.)	
)	

Pursuant to Rule 6(d) of the Court's Local Civil Rules, Rick Boyer, Esq., Counsel for Defendant Ahmad Osmani, hereby moves for this Court to admit Defendant's present counsel, B. Tyler Brooks, Esq., to practice before this Court for purposes of this case *pro hac vice*, and pursuant to the same Rule, to be permitted to "appear at hearings or trials in the absence of an associated member." In support of his motion, Counsel respectfully represents as follows:

1. Mr. Brooks has been lead counsel for Defendant since the outset of this case.
2. Mr. Brooks is not a member of the bar of this Court.

3. However, Mr. Brooks is a member in good standing of the North Carolina Bar, and is admitted to the bar of the following courts:

State Bar Admissions:

- North Carolina
- South Carolina
- Tennessee
- Michigan

Federal Court Admissions:

- U.S. Supreme Court
- U.S. Court of Appeals for the First Circuit
- U.S. Court of Appeals for the Second Circuit
- U.S. Court of Appeals for the Third Circuit
- U.S. Court of Appeals for the Fourth Circuit
- U.S. Court of Appeals for the Fifth Circuit
- U.S. Court of Appeals for the Sixth Circuit
- U.S. Court of Appeals for the Seventh Circuit
- U.S. Court of Appeals for the Eighth Circuit
- U.S. Court of Appeals for the Ninth Circuit
- U.S. Court of Appeals for the Tenth Circuit
- U.S. Court of Appeals for the Eleventh Circuit
- U.S. Court of Appeals for the Armed Forces

- U.S. District Court for the District of Colorado
- U.S. District Court for the Eastern District of Michigan
- U.S. District Court for the Western District of Michigan
- U.S. District Court for the District of New Mexico
- U.S. District Court for the Eastern District of North Carolina
- U.S. District Court for the Middle District of North Carolina
- U.S. District Court for the Western District of North Carolina
- U.S. District Court for the District of South Carolina
- U.S. District Court for the Western District of Tennessee
- U.S. District Court for the Western District of Wisconsin
- U.S. Tax Court

Other Admissions:

- Judicial Branch of the Eastern Band of Cherokee Indians
4. Mr. Brooks is of good character and standing, and has the requisite experience and professionalism to appear before this Court and zealously advocate for Defendant's interests.

WHEREFORE, Counsel respectfully asks moves the admission of B. Tyler Brooks, Esq., to practice pro hac vice before this Court in the above-captioned matter only. Counsel also moves that this Court exercise its discretion to allow Mr. Brooks to "appear at hearings or trials in the absence

of an associated member," pursuant to Rule 6(d) of the Local Rules of this Court.

Respectfully submitted, this the 5th day of October, 2022.

BY: /s/Rick Boyer
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† *pro hac vice* motion attached.

Counsel for Defendant Ahmad Osmani

CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF systems, which will send notification to counsel of record of such filing to all CM/ECF participants and further certify that a copy was sent via US mail to the following:

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/s/Rick Boyer
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